

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MFB FERTILITY INC.,

Plaintiff,

v.

ACTION CARE MOBILE VETERINARY  
CLINIC, LLC,

Defendant.

Case No. 1:23-cv-03854

Judge Harry D. Leinenweber  
Magistrate-Judge Gabriel A. Fuentes

**PLAINTIFF MFB FERTILITY INC.'S MOTION TO DISMISS  
DEFENDANT ACTION CARE MOBILE VETERINARY CLINIC LLC'S  
COUNTERCLAIMS**

Plaintiff MFB Fertility Inc. ("MFB"), pursuant to P. 12(b)(6), respectfully requests this Court enter an Order dismissing Defendant Action Care Mobile Veterinary Clinic, LLC's ("Action Care") Counterclaims because the counterclaims fail to state a claim upon which relief may be granted. MFB submits the accompanying Memorandum in Support of its Motion to Dismiss.

WHEREFORE, MFB respectfully requests entry of an Order dismissing Action Care's Counterclaims pursuant to Fed. R. Civ. P. 12(b)(6).

Respectfully submitted,

/s/ Dean D. Niro

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